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ATTORNEYS FOR DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ANN CARLATTA [sic],

Plaintiff,

v.

BERTELSMANN, INC.; and RTL  
ADCONNECT, INC.,

Defendants.

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CIVIL ACTION NO. \_\_\_\_\_

To: Clerk of Court  
United States District Court for the District of New Jersey  
MLK, Jr. Building and U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

The Law Office of Richard Malagiere  
Leonard E. Seaman, Esq.  
250 Moonachie Road  
Suite 102  
Moonachie, NJ 07074  
Attorneys for Plaintiff

**APPLICATION FOR AN EXTENSION OF TIME TO MOVE, ANSWER OR  
OTHERWISE RESPOND PURSUANT TO L. CIV. R. 6.1**

Application is hereby made for a Clerk's order extending time within which Defendants Bertelsmann, Inc. ("Bertelsmann") and RTL AdConnect, Inc. ("RTL") (collectively, "Defendants") may answer, move or otherwise respond to the complaint filed by Plaintiff Ann Carletta herein and it is represented that:

- (i) No previous extension has been obtained;
- (ii) Defendants accepted service of the Summons and Complaint on September 15, 2020, and removal occurred on October 12, 2020;
- (iii) The time to answer, move or otherwise respond expires on October 19, 2020;
- (iv) Defendants hereby request that the time within which they may file an answer, move or otherwise respond to the complaint herein be extended by fourteen (14) days to November 2, 2020.
- (v) This request is made without waiving any defenses, including the lack of personal jurisdiction.

Respectfully submitted,

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Dated: October 12, 2020

By: s/ Mary L. Moore  
Mary L. Moore

**ATTORNEYS FOR DEFENDANTS**